Chemours GenX Waste Importation

- Chemours imports GenX waste from their facility in the Netherlands.
- Federal rule requires they report annually to EPA with an upper limit of the amount imported each year. They are reporting an upper limit of 90 metric tons in about 20 shipments of unknown concentration for 2019.
- This material, a sludgy liquid, is imported to the Chemours Fayetteville Works facility where it is reclaimed in the PPA area by removing some GenX salts (the NH4 salt, mainly) and adding water.
- The facility says this material does not go to their wastewater treatment facility.
- This substance is regulated as a hazardous waste in the Netherlands, but is not in the US.
- EPA recently discovered that two separate waste streams are shipping from the Netherlands but they only have data on one waste stream. They are trying to determine if the streams are combined at some point and to get analysis results on both.
- This waste is/has also been shipped to a non-Chemours facility in Italy for reclamation.

HW Questions for Chemours

- More info about the reclamation process
 - O How is the material used after reclamation?
 - O How is the material stored prior to reclamation?
 - O What % is able to be reclaimed?
 - What % of material is reclaimed annually? (i.e., can they show it is not being speculatively accumulated?)
 - What are the wastes associated with this reclamation process and how much is produced per ton reclaimed?
 - Do any of these wastes go to the WWTP onsite or how are they managed and disposed?
 - How is the resulting reclaimed material used, at this site or elsewhere? In what part of the process?
- Does the facility reclaim similar wastes from facilities in the US that use GenX in their processes, such as the Washington works facility? If not, why not?
- What is the value of the reclaimed material? Is any of it sold to other entities to be used anywhere besides at Chemours facilities?

HW Concerns

- That importation is not being used to circumvent European regulations.
- That the material is being discharged into the river at the Fayetteville facility or in any other way being disposed rather than reclaimed and reused.
- Could this waste be regulated under TSCA or RCRA?
- Could this issue be addressed under the CO?